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November 14, 2024

The Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Mohamed Bahi, 24 Mag. 3535

Dear Judge Wang:

We write on behalf of the Defendant in the above-referenced matter, Mohamed Bahi, to respectfully request an additional extension of time to meet the conditions of release detailed on October 8, 2024. Mr. Bahi submitted two co-signers that provided requested documents to the government and were interviewed during the week of October 16th. Given the financial resources of one of the two co-signers, the government asked whether a substitute co-signer could be utilized. After further deliberations, the parties are now working to additionally secure the bond with property owned by the defendant. That process is underway, which we understand will require a separate filing by the defense in New York Supreme Court to confess judgment by the defendant in the event that he fails to appear or otherwise defaults on the bond. As a result of the foregoing, we respectfully request an extension of time until November 22, 2024 for the defendant to fully satisfy the conditions of release. The government does not object to this request.]

Respectfully submitted,

/s/Derek Adams

Derek Adams

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